

① Facility Contact

MOD040115073

Chandeysson Plant RPG ABEX

4084 Bingham Avenue

St. Louis, MO 63116

② Facility Contact

MOD031003767

ABEX

6600 Ridge Avenue

St. Louis, MO 63133

③ Facility Contact

MOD006265425

St. Louis Lithographing Co.

6880 Heegl Avenue

St. Louis, MO 63103

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SEP 03 1982

A. Walker Bingham
General Attorney
ABEX Corporation
530 Fifth Avenue
New York, New York 10036

RE: EPA I.D. No. MOD040115073
Chandeysson Plant-RPG ABEX
EPA I.D. No. MOD031003767
ABEX - 6600 Ridge Avenue
EPA I.D. No. MOD006265425
St. Louis Lithographing Co.

Dear Mr. Bingham:

Thank you for your recent letter and documentation which was submitted to the Regional Administrator, Environmental Protection Agency (EPA), Region VII, to demonstrate compliance with the EPA regulations (40 CFR Part 265, Subpart H, Sections 143-151) in the areas of financial assurance for closure and post-closure, and liability insurance for your facility located in Missouri.

We have reviewed your submittal for compliance with the above referenced regulation and have listed below the deficiencies for your consideration and correction as noted.

1. The regulations (40 CFR Part 265.143 - Closure Insurance) allow an additional 90 days from July 6, 1982, to obtain insurance for closure and post-closure assurance. We have received the appropriate notice indicating your intent to use this method of assurance, therefore, EPA Region VII, Permits Section, anticipates receipt of the RCRA Certificate of Insurance for Closure (pg. 15062, April 7, 1982, Federal Register) by October 6, 1982, in order to prevent enforcement action against your Company for non-submittal of the financial assurance documents.

2. In order to accurately evaluate your financial capabilities for closure, it is necessary to evaluate the cost estimate for closure of your facility. Please submit a detailed explanation of the closure procedures and those costs related to the specific activities within the closure procedure (40 CFR, Part 265.112) to this EPA, Regional Office, Permits Section within 30 days of receipt of this letter.

The Liability Insurance Certificate submitted by Northbrook Excess and Surplus Lines Insurance in care of National Union Fire Insurance effective April 1, 1982, provides the adequate minimum coverage for third party liability insurance required by 40 CFR, Part 265.147.

In reviewing the ABEX Corporation files, the EPA records indicate generator status only for EPA identification number MOD006265425 (St. Louis Lithographing Company) and EPA identification number MOD040115073 (Chandeysson Plant). The facility with EPA identification number MOD031003767 (6600 Ridge Avenue) is the only facility with a Part A indicating treatment, storage and disposal (TSD) status. However, your letter of July 19, 1982, indicates that ABEX believes

ARWM/WMBR-PMTS:MGiven:1mb:x6531:8-31-82:Disk A/13

CONCURRENCES

SYMBOL	PMTS	PMTS	WMBR		
SURNAME	Given	Harrington	Morby		
DATE	8/31/82	9/7/82	9/2/82	9/1/82	

EPA Form 1320-1 (12-70)



RCRA RECORDS

LE COPY

EPA identification number MOD040115073 (4084 Bingham) is the only TSD facility in Region VII. Please clarify this situation and provide EPA, Region VII, Permits Section the appropriate documentation within 30 days of receipt of this letter.

For your information, the financial requirements of Subpart H apply only to owners/operators of TSD facilities, not generators, as specified in 40 CFR 265.140-147.

Thank you for your cooperation in supplying the additional information to expedite the review of your compliance with the financial assurance requirements as owner/operator of a hazardous waste management facility.

If you have further questions, please contact Midge Given of my staff at (816) 374-6531.

Sincerely yours,

Robert L. Morby
Chief, Waste Management Branch
Air and Waste Management Division

cc: Facility Contact
MOD040115073 (Chandeysson Plant - RPG ABEX, 4084 Bingham) ✓
MOD030003767 (ABEX - 6600 Ridge Avenue) ✓
MOD006265425 (St. Louis Lithographing Co.) ✓

bcc: Michael Sanderson, AWCM ✓